

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Manolin Jason Mercado,

Plaintiff,

v.

Prime 570, Inc., *et al.*,

Defendants.

No. 3:11-cv-2315

(Judge Conaboy)

**JOINT MOTION TO AMEND CASE MANAGEMENT ORDER**

1. This action was brought by a quadriplegic Plaintiff against multiple Defendants and involves dozens of fact and expert witnesses for Plaintiff and Defendants.

2. The parties have been diligently working on completing discovery. In addition to actively conducting written discovery, over 25 depositions of witnesses have been conducted in Allentown, Easton, New York, Scranton and Stroudsburg.

3. Although all counsel have been extremely cooperative with scheduling, approximately seven more depositions, including Plaintiff's deposition, need to be taken because, *inter alia*, Plaintiff became ill and was hospitalized for over two weeks and certain counsel were attached for trial.

4. Accordingly, the parties jointly request that the Court enter the proposed Joint Stipulated Amended Case Management Order extending the deadlines for discovery and amendments to pleadings by 45 days, and extending the deadlines for experts' reports by 30 days.

5. These extensions will not interfere with the scheduled trial date, which is October 7, 2013.

WHEREFORE, the parties respectfully request that the Court grant their joint motion and enter the attached proposed Order.

Respectfully submitted,

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Date: April 25, 2013